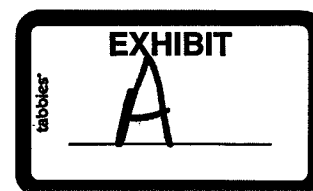


IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
Plaintiffs,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,)
Defendants.)

VOLUME I OF THE DEPOSITION OF

W. A. SAUNDERS, produced as a witness on behalf of
the Plaintiffs in the above styled and numbered
cause, taken on the 23rd day of October, 2006, in
the City of West Siloam Springs, County of Delaware,
State of Oklahoma, before me, Lisa A. Steinmeyer, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.



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1 handwriting that prepared the date, the handwritten
2 date?

3 A I believe it is.

4 Q So based on your testimony, that's the general
5 number of birds, 90 to 94,000, that you talked about
6 earlier?

12:55PM

7 A Right.

8 Q Who is considered to be in charge of the
9 day-to-day operation of the poultry growing portion
10 of your business?

12:56PM

11 A I am.

12 Q All right. Has anyone else ever been a part
13 of that operation or in charge of the
14 responsibility -- let me rephrase that. I got
15 interrupted. Has anyone else been in charge of
16 day-to-day operation besides yourself since you
17 purchased it?

12:56PM

18 A No. I mean unless I go for a vacation and
19 someone watches it while I'm gone, but I'm still in
20 charge day to day.

12:56PM

21 Q Has your wife ever been in charge of the
22 day-to-day operation of the poultry growing
23 operation?

24 A No.

25 MR. WILLIAMS: Remember to let him finish

12:56PM

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capacity as ATTORNEY GENERAL)
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ENVIRONMENT C. MILES TOLBERT,)
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TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)
Plaintiffs,)
vs.) 4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,)
Defendants.)

VOLUME II OF THE DEPOSITION OF
W. A. SAUNDERS, produced as a witness on behalf of
the Plaintiffs in the above styled and numbered
cause, taken on the 27th day of October, 2006, in
the City of West Siloam Springs, County of Delaware,
State of Oklahoma, before me, Lisa A Steinmeyer, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

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1 Q I'll ask you to look at Saunders page --
2 actually I misspoke. Here's another set of
3 excerpts. Actually you can look in the book. You
4 have the book there which has the ODAFF records in
5 it. I'll ask you to look at 16101. Do you
6 recognize that document, sir?

12:03PM

7 A I do.

8 Q And that document on its Page 3 has your
9 signature notarized as of January of '05, January
10 26th?

12:03PM

11 A Which document?

12 Q Same document but three pages -- it's a
13 three-page document, and that's your signature?

14 A It is.

15 Q This is, as I understand it, a communication
16 by you to ODAFF requesting a change of the operator
17 to your poultry growing operation; is that correct?

12:04PM

18 A That's correct.

19 Q Tell me why it is you were requesting the
20 removal of Bev Saunders as an operator from the
21 ODAFF.

12:04PM

22 A The way the -- it's my understanding the way
23 the state law sets up on your education, if there's
24 two people's names on that as operators, both of
25 them are required to have the three hours of

12:04PM

1 training per year, which would mean Bev and I would
2 both have to go to meetings, whereas if there's just
3 one on there, she could stay at home and watch the
4 chickens while I go to the meetings.

5 Q You say meetings. The instructional courses? 12:05PM

6 A The instructional courses.

7 Q Is that the only reason?

8 A That's the only reason.

9 Q I'd ask you to look at 16174. Do you see a
10 letter there signed by Mr. Parish of the Department 12:05PM
11 of Agriculture?

12 A Yeah.

13 Q And it's addressed to you and Ms. Saunders on
14 December 30, 2004?

15 A Uh-huh. 12:05PM

16 Q That apparently is in response to your request
17 to remove her from the owner-operator. Is that what
18 you understand that letter to be?

19 A Looks to me like, yes.

20 Q And as a result of that letter, did you send a 12:05PM
21 new report?

22 A I don't know, sir.

23 Q Okay. Did you send a report that we first
24 looked at, 16101?

25 A I did, yes. 12:06PM

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